

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PEOPLETLO MANUFACTURING, INC.,

Plaintiff,

v.

**SUNDYNE, LLC; DXP ENTERPRISES,
INC.; and PUMPWORKS, LLC,**

Defendants,

Case No. 1: 20-CV-03642

Honorable Manish S. Shah

Magistrate Judge Young B. Kim

PUMPWORKS, LLC,

Counter-Plaintiff,

v.

PEOPLETLO MANUFACTURING, INC.,

Counter-Defendant.

**JOINT STATUS REPORT OF PEOPLETLO MANUFACTURING, INC.,
SUNDYNE, LLC, AND ACCUDYNE INDUSTRIES, LLC**

Plaintiff/Counter-Defendant, PeopleFlo Manufacturing, Inc. (“Plaintiff” or “PeopleFlo”), and Defendants, Sundyne, LLC (“Sundyne”) and Accudyne Industries, LLC (“Accudyne”), by and through their respective counsel, submit the following Joint Status Report:

1. In accord with Dkt.# 443 and #449, the parties report the following.
2. Counsel for PumpWorks and PeopleFlo have conferred and concur that expert testimony is not necessary relating to PumpWorks’ claims against PeopleFlo.
3. The parties identify their experts and their areas of expertise as follows:
 - a. PeopleFlo identifies:
 - i. Gary Kleinrichert (Secretariat) as to damages and valuation issues.

- ii. William Blankemeier (PeopleFlo) as a technical expert relating to the issues of trade secrets and confidential information misappropriated by Sundyne and Accudyne, and to the extent that it may be considered expert testimony, damages and valuation issues.
- b. Defendant Accudyne and Sundyne identify:
- i. Kees van der Sluijs – an independent expert in pump design and engineering on the remaining alleged combination trade secret on bearings technology.
 - ii. David Clark (Sundyne) – on Sundyne’s development and design of the Kontro CSA pump.
 - iii. Claire Barton (Sundyne) – on Sundyne’s sales of the Kontro CSA pumps that incorporate the alleged combination trade secret.
 - iv. Any other experts Sundyne and Accudyne deem appropriate and necessary in response to Plaintiff’s expert’s Rule 26(a)(2) reports and/or deposition testimony.

4. For expert discovery, the parties are conferring about supplemental document production in advance of expert reports. Considering the foregoing, and other scheduling conflicts for the parties and their experts, PeopleFlo and Sundyne/Accudyne propose the following schedule for expert reports:

- Friday, July 18, 2025: deadline for parties to submit Rule 26(a)(2) disclosures and initial expert reports on issues for which they have the burden of proof;
- Friday, September 12, 2025: deadline for parties to submit Rule 26(a)(2) disclosures and reports for rebuttal and all other experts; and
- Friday, October 31, 2025: deadline to complete depositions of experts.

Dated: April 29, 2025

Respectfully submitted,

By: /s/ John T. Ruskusky

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